

PABST BREWING COMPANY

100 SHORELINE HWY. • BLDG. B, SUITE 395 • MILL VALLEY, CA 94941

TELEPHONE: (415) 332-0550 • FAX: (415) 332-0567

YEORYIOS C. APALLAS Vice President and General Counsel

By Federal Express

DMS DoolD 2070457

May 10, 2006

Laura B. Janson, Chief Cost Recovery Branch USEPA, Region III 1650 Arch Street Philadelphia, PA 19103-2029

Re: Sauer Dump Site, Dundalk, (Baltimore County) Maryland

Dear Ms. Janson:

I am responding to your letter dated May 3, 2006, requesting information from the Pabst Brewing Company regarding the Sauer Dump Site and F&M Schaefer Brewing Company that allegedly used the above site to deposit pollutants.

Please be advised that we are not the successor to F&M Schaefer Brewing Company and accordingly do not posses any documents or information that would be responsive to your request dated May 3, 2006. Our Internet research has revealed that the F&M Schaefer Brewing Company bought the Gunther Brewing Company in 1963 from Theo. Hamm Brewing Company. In 1978, the F&M Schaefer Brewing Company closed the doors of the Gunther brewery on Brewery Hill in 1978.

The F & M Schaefer Brewing Company, operating in New York City, and last operating in that location in 1976 was purchased by the Stroh Brewery Company in 1981. In 1999, Pabst Brewing Company acquired certain assets of Stroh Brewing Company, among them, the F&M Schaefer labels.

With the above preface in mind, Pabst Brewing Company (PBC) responds as follows:

1. Our current business is to contract for malt beverages and the distribution thereof through our wholesaler network throughout the United States, South America, and Hong Kong. Although PBC is a United States brewer, it currently has no brewing operations, relying instead, on contract brewing to secure its malt beverages. Three

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brewers provide 100% of Pabst's requirements. They are: Miller Brewing Company, Lion Brewing Company, and City Brewing Company.

PBC's business changed from an actual brewer to a virtual brewer. That change evolved over a number of years and was finalized in late 2001 when the last of its breweries was closed and all production was transferred to Miller Brewing Company (MBC).

- 2. In response to Question 2, PBC has no information on which to base a response. To the extent such information exists, it would be in the possession of the SBC Holdings f/k/a Stroh Brewery Company located at 300 River Place; Suite 500, Detroit, Michigan 48207; Att: John W. Stroh, III; and represented by counsel, George Kuehn, Butzel Long, PC, 150 W. Jefferson Avenue, Suite 900, Detroit, Michigan, 48226. Telephone: (313-225-7058; Facsimile: 313-225-7080.
- 3. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 4. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 5. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 6. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 7. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 8. The person most likely to know of our disposal practices at PBC, would be Bill Radtke, Vice President, Operations, Pabst Brewing Company, 3939 W. Highland Boulevard, Building 66, Office 35, Milwaukee, WI 53208, Telephone: 414-931-4427 and Robert Newman who may be reached at the above address.
- 9. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.

- 10. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 11. PBC lacks sufficient information on which to base an answer to this question. PBC is not currently in possession of any documents that would provide an answer to this question. See Response to No. 2, above.
- 12. In response to this question please see the preface to the letter which describes the F&M Schaefer Brewing Company's acquisition history.
- 13. Yeoryios C. Apallas, Vice President and General Counsel, Pabst Brewing Company, 100 Shoreline Highway, Building B, Suite 395, Mill Valley, CA 94941; Telephone 415-332-0550.
- 14. <u>David Mahoney</u>, Vice President, Sales, Pabst Brewing Company, 1721 Moonlake Boulevard, Suite 205, Hoffman Estates, IL 60194; Telephone: 847-839-4256.
- Bill Radtke, Vice President, Operations, Pabst Brewing Company, 3939 W. Highland Boulevard, Building 66, Office 35, Milwaukee, WI 53208, Telephone: 414-931-4427.
- 15. PBC believes that Mr. George Kuehn, Vice President, Secretary and General Counsel of SBC Holding f/k/a Stroh Brewery Company, may have information responsive to this question. Please see Response to Question No. 2 for additional information.
 - 16. See Response to Question No. 15.
 - 17. See Response to Question No. 15.

I regret that I am unable to provide further information to you in response to your multi-page questionnaire. However, if you, or Ms. Joan E. Martin-Banks (3HS62), has any questions about the matters I represent in this letter, please call me at (415) 332-0550.

Sincerely,

orvios C. Apallas

Lee President and General Counsel